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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BOURNE VALLEY COURT TRUST,
Plaintiff,

vs.

WELLS FARGO BANK, N.A.; MTC
FINANCIAL, INC., dba TRUSTEE CORPS;
RENEE JOHNSON; and NEVADA LEGAL
NEWS, LLC,

Defendants.

Case No.: 2:13-cv-00649-JCM-GWF

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE
OPPOSITION TO WELLS FARGO'S
MOTION FOR SUMMARY JUDGMENT
[ECF NO. 136]**

Plaintiff BOURNE VALLEY COURT TRUST (“**Bourne Valley**”) and WELLS FARGO BANK, N.A. (“**Wells Fargo**”) (collectively, the “**Parties**”), through their undersigned counsel of record, hereby respectfully request the Court enter an order, pursuant to Local Rules IA 6-1 and 26-4, extending the date for Bourne Valley to file its response to Wells Fargo’s motion for summary judgment [ECF No. 136] from its current due date of Wednesday, April 18, 2018, to **May 2, 2018**. This is the first request to extend the deadline to respond to Wells Fargo’s motion for summary judgment.

On March 28, 2018, Wells Fargo filed its motion for summary judgment based on 12 U.S.C. § 4617(j)(3), Freddie Mac’s interest in the subject property, the servicing relationship between Freddie Mac and Wells Fargo, and the lack of consent to the foreclosure by the Federal

Housing Finance Agency ("FHFA") [ECF No. 136]. Bourne Valley's opposition to the motion is currently due on Wednesday, April 18, 2018.

I. Good Cause Exists for Extending the Deadline to Respond to Wells Fargo's Motion

The deadline the Parties seek to extend has not expired. This Stipulation is made for the benefit and convenience of the Parties. This request is not made for any deleterious purpose or to cause delay, but is made in good faith by the Parties.

II. Proposed Schedule

The Parties respectfully request that the Court grant this Stipulation and extend the deadline for Bourne Valley to respond to Wells Fargo's motion for summary judgment to May 2, 2018.

DATED this 18th day of April, 2018.

KIM GILBERT EBRON

/s/Jacqueline A. Gilbert
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DATED this 18th day of April, 2018.

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IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: April 19, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 18th day of April 2018, pursuant to FRCP 5, I served via the CM-ECF electronic filing system the foregoing **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE OPPOSITION TO WELLS FARGO'S MOTION FOR SUMMARY JUDGMENT [ECF NO. 136]**

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